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*Attorneys for the Ad Hoc Group of Personal
Injury and Wrongful Death Tort Claimants*

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION**

In re

WINDSOR TERRACE HEALTHCARE, LLC,
et al.,

Debtors.

☒ Affects All Debtors

Case No. 1:23-bk-11200-VK

Jointly Administered

Chapter 11

**SECOND SUPPLEMENT TO THE
VERIFIED STATEMENT OF THE AD
HOC GROUP OF PERSONAL INJURY
AND WRONGFUL DEATH TORT
CLAIMANTS PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE
2019**

On May 7, 2024, the Ad Hoc Group of Personal Injury and Wrongful Death Tort Claimants (the “Ad Hoc Group”) filed the *Verified Statement of the Ad Hoc Group of Personal Injury and Wrongful Death Tort Claimants Pursuant to Federal Rule of Bankruptcy Procedure 2019* [Docket No. 893] (the “Original Rule 2019 Statement”). On May 17, 2024, the Ad Hoc Group filed the *First Supplement to the Verified Statement of the Ad Hoc Group of Personal Injury and Wrongful Death Tort Claimants Pursuant to Federal Rule of Bankruptcy Procedure 2019* [Docket No. 939], reflecting that additional creditors joined the Ad Hoc Group. The Ad Hoc Group continues to expand, and a revised and restated Exhibit A is attached hereto. All other portions of the Original Rule 2019 Statement remain complete and correct.

Consistent with 28 U.S.C. § 1746 and Federal Rule of Bankruptcy Procedure 9011(b), the undersigned hereby affirms under penalty of perjury that this verified statement is true and correct.

DATED: August 2, 2024

PFISTER & SASO, LLP

By: /s/ Robert J. Pfister

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*Attorneys for the Ad Hoc Group of Personal Injury and Wrongful
Death Tort Claimants*

Pfister
& Saso, LLP

PS

Revised and Restated Exhibit A



**Ad Hoc Group of Personal Injury and
Wrongful Death Claimants – Windsor**

Primary Claimant (Decedent or Injured Resident)	Primary State Court Counsel
Donald Knestrict [Katherine Felkins] Case No. 34-2022-00313404 (Sacramento Cnty.) and Claim Nos. 11, 12 in 1:23-bk-11208 (Windsor Court) and Nos. 18, 19 in 1:23-bk-11401 (Windsor Sacramento Estates) -and- Edilberto Pimentel [Aquilina Pimentel, Mary Ann Pimentel, Edilberto Pimentel, Jr.] Case No. 34-2021-00301511 (Sacramento Cnty.) and Claim Nos. 14, 15, 16, 17 in 1:23-bk-11212 (Windsor Elk Grove)	Edward P. Dudensing (ed@dudensinglaw.com) Dudensing Law 1610 R Street, Suite 220 Sacramento, California 95816
Timothy Scott [Gabriel Scott] Case No. 34-2017-00218038 (Sacramento Cnty.) and Claim No. 23 in 1:23-bk-11401 (Windsor Sacramento Estates) -and- Kathryn Long [Richard Long, Jeannette Long] Case No. STK-CV-2023-11595 (San Joaquin Cnty.) and Claim Nos. 18, 19 in 1:23-bk-11215 (Windsor Hampton) and 15, 16 in 1:23-bk-11218 (Windsor Skyline)	Wendy C. York (wyork@yorklawfirm.net) York Law Firm 1111 Exposition Boulevard, Building 500 Sacramento, California 95815
Ruby Evans [Willette Williams, Ronnie Evans, James Evans] Case No. FC5055755 (Solano Cnty.) and Claim Nos. 15, 16, 17, 18 in 1:23- bk-11220 (Windsor Vallejo)	Christopher Buckley (chris@chrisbuckleylaw.com) Buckley Law 170 Hillcrest Road Berkeley, California 94705



**Ad Hoc Group of Personal Injury and
Wrongful Death Claimants – Windsor**

Primary Claimant (Decedent or Injured Resident)	Primary State Court Counsel
Sidney Krow [Michelle Krow, Stacy Armstrong] Case No. 23CV034696 (Alameda Cnty.) and Claim No. 18 in 1:23-bk-11207 (Windsor Country Drive) -and- Lin Yuan Weng [Rachel Zi Liang Zhou] Claim No. 17 in 1:23-bk-11207 (Windsor Country Drive)	Kirsten Fish (kfish@nkf-law.com) Needham Kepner & Fish LLP 1960 The Alameda, Suite 210 San Jose, California 95126 -and- Karman Guadagni (karman@sggklaw.com) Stebner Gertler Guadagni & Kawamoto 870 Market Street, Suite 1285 San Francisco, California 94102
Lawrence Leslie [Sara Leslie] Case No. 24CV001372 (Sacramento Cnty.) and Claim Nos. 24, 25 in 1:23-bk-11213 (Windsor Elmhaven) -and- Carol Parks [Kimberly Emslander, Melanie Schwemer, Charles Parks, Michael Parks] Case No. 24CV001531 (Sacramento Cnty.) and Claim Nos. 29, 30, 31, 32, 33 in 1:23-bk-11401 (Windsor Sacramento Estates)	Sean Laird (seanlairdlaw@gmail.com) The Law Firm of Sean R. Laird 1007 Seventh Street, 4th Floor Sacramento, California 95814
Mary Carter [Nathan Floyd] Case No. 19STCV11538 (Los Angeles Cnty.) and Claim No. 26 in 1:23-bk-11206 (Windsor Cheviot Hills)	Nicholas Heiman (heimanlaw@gmail.com) Law Office of Nicholas Heiman 8200 Wilshire Boulevard, Suite 400 Beverly Hills, California 90211



**Ad Hoc Group of Personal Injury and
Wrongful Death Claimants – Windsor**

Primary Claimant (Decedent or Injured Resident)	Primary State Court Counsel
Dallas Nelson, Jr. [Delcine Nelson, Marc Nelson] Case No. STK-CV-UMM-2024-998 (San Joaquin Cnty.) and Claim Nos. 24, 25, 26 in 1:23-bk-11401 (Windsor Sacramento Estates)	Nicholas Leonard (nick@ih-llp.com) Ikuta Hemesath LLP 3626 Fair Oaks Boulevard, Suite 100 Sacramento, California 95864
Cynthia Davidson [Corinthia French] Case No. 23CV007089 (Sacramento Cnty.) and Claim No. 22 in 1:23-bk-11210 (Windsor El Camino) -and- Larry D. Jefferson [Reashaun Jefferson, Yolanda Jefferson] Case No. 23CV030693 (Alameda Cnty.) and Claim No. 9 in 1:23-bk-11402 (Windsor Hayward Estates)	Jennifer Fiore (jennifer@thefafirm.com) Fiore Achermann 340 Pine Street, Suite 503 San Francisco, California 94104 -and- Susan Kang Gordon (susan@skg-law.com) The Law Office of Susan Kang Gordon 21C Orinda Way #162 Orinda, California 94563
Aaeron Deleon [Lawonda Deleon, Aaryn Deleon, Ayza Deleon] Case No. 34-2022-00325930 (Sacramento Cnty.) and Claim No. 34 in 1:23-bk-11212 (Windsor Elk Grove) -and- Bryan Nash Case No. 34-2022-00327033 (Sacramento Cnty.) and Claim No. 46 in 1:23-bk-11210 (Windsor El Camino)	Carl A. McMahan (cam@mcmahancarroll.com) Richard D. Carroll (rdc@mcmahancarroll.com) Sheila J. Starvish (sjs@mcmahancarroll.com) McMahan & Carroll PC 11755 Wilshire Boulevard, Suite 2370 Los Angeles, California 90025



**Ad Hoc Group of Personal Injury and
Wrongful Death Claimants – Windsor**

Primary Claimant (Decedent or Injured Resident)	Primary State Court Counsel
Drena Humphries [Alan Humphries, George Humphries, John Humphries] Case No. 23STCV00307 (Los Angeles Cnty.) and Claim No. 17 in 1:23-bk-11214 (Windsor Gardens Convalescent Hospital) -and- James Portis [Patricia Portis] Case No. 21STCV16326 (Los Angeles Cnty.) and Claim No. 19 in 1:23-bk-11206 (Windsor Cheviot Hills) -and- Iman Shabazz [Tiffany Harrison] Claim No. 22 in 1:23-bk-11213 (Windsor Elmhaven) and Claim No. 17 in 1:23-bk-11401 (Windsor Sacramento Estates) -and- Catherine Wicker Case No. 22STCV01554 (Los Angeles Cnty.) and Claim No. 21 in 1:23-bk-11213 (Windsor Elmhaven)	Adam J. Peck (adam@thepecklawgroup.com) Peck Law Group 6454 Van Nuys Blvd., Suite 150 Van Nuys, California 90034 -and- Daren M. Schlechter (daren@schlechterlaw.com) Law Office of Daren M. Schlechter, P.C. 10866 Wilshire Blvd., Suite 1270 Los Angeles, California 90024
Deborah Washington [Brandy Russell] Case No. 34-2022-00329913 (Sacramento Cnty.) and Claim No. 20 in 1:23-bk-11210 (Windsor El Camino)	Justin L. Ward (justin@thewardfirm.com) The Ward Firm 4600 Natomas Crossing Drive, Suite 200-389 Sacramento, California 95834
Denisa Caldwell Case No. 24STCV03096 (Los Angeles Cnty.) and Claim No. 160 in 1:23-bk-11200 (Windsor Terrace)	Valentina Ambarchyan (val@ambarchyanlaw.com) Ambarchyan Law, APC 535 North Brand Avenue, Suite 500 Glendale, California 91203



**Ad Hoc Group of Personal Injury and
Wrongful Death Claimants – *Windsor***

Primary Claimant (Decedent or Injured Resident)	Primary State Court Counsel
Jerry Orrick [Joe Orrick] Case No. 23CV002855 (Sacramento Cnty.) and Claim No. 34 in 1:23-bk- 11401 (Windsor Sacramento Estates)	Thomas G. C. McLaughlin (tom@mdxlaw.com) McLaughlin Dixon LLP 428 J Street, 4th Floor Sacramento, California 95814 -and- Andrew J. Collins (andrew@andrewcollinslaw.com) 10866 Wilshire Blvd., Suite 1270 Los Angeles, California 90024

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

10250 Constellation Blvd., Suite 2300, Los Angeles, California 90067

A true and correct copy of the foregoing document entitled (*specify*): **SECOND SUPPLEMENT TO THE VERIFIED STATEMENT OF THE AD HOC GROUP OF PERSONAL INJURY AND WRONGFUL DEATH TORT CLAIMANTS PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019** will be served or was served ~~(a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b)~~ in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **August 2, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

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

August 2, 2024

Robert J. Pfister

Date

Printed Name

/s/ Robert J. Pfister

Signature

Mailing Information for Case 1:23-bk-11200-VK

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Katalina Baumann** Katalina.Baumann@troutman.com, evelyn.duarte@troutman.com, LitigationDocketRequests@troutman.com, elizabeth.streible@troutman.com, Hilary.Barton@Troutman.com, OCCcourtntices@troutman.com, Susan.Henry@Troutman.com
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