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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

SOUND SHORE MEDICAL CENTER OF WESTCHESTER, *et al.*,	Chapter 11 Case No. 13-22840 (RDD)
Debtors.	(Jointly Administered)

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CERTIFICATE OF NO OBJECTION WITH RESPECT TO THE PLAN ADMINISTRATOR'S OBJECTION TO PROOFS OF CLAIM FILED BY OR ON BEHALF OF DR. CONSUELO RODRIGUEZ

[Related Document 1449]

1. On June 16, 2017, counsel for the Plan Administrator and Estate of Sound Shore Medical Center of Westchester and certain of its affiliates[1] in the above-referenced chapter 11 cases (the "**Chapter 11 Cases"**), filed and served the *Plan Administrator's Objection to Proofs of Claim Filed by or on Behalf of Dr. Consuelo Rodriguez* (the "**Objection**") [Docket No. 1449] which seeks an Order expunging certain proofs of claim filed in these Chapter 11 Cases.

[1] The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number include: Sound Shore Health System, Inc. (1398), Sound Shore Medical Center of Westchester (0117), The Mount Vernon Hospital (0115), Howe Avenue Nursing Home, Inc. d/b/a Helen and Michael Schaffer Extended Care Center (0781), NRHMC Services Corporation (9137), The M.V.H. Corporation (1514) and New Rochelle Sound Shore Housing, LLC (0117). There are certain additional affiliates of the Debtors who are not debtors and have not sought relief under Chapter 11.

2. Responses to the Objection were originally to be filed and served no later than **July 11, 2017 at 4:00 p.m. prevailing Eastern Time**. A hearing on the Objection was originally scheduled for **July 18, 2017 at 10:00 a.m. (prevailing Eastern Time)**.

3. Due to informal discussions with counsel to the claimant Dr. Consuelo Rodriguez, the hearing on the relief requested by the Objection was carried and remains unresolved.

4. On December 20, 2018, council to the Plan Administrator filed a *Status Report* [Docket No. 1552] indicating that the hearing on the Objection would be held on **January 29, 2019 at 10:00 a.m. (prevailing Eastern Time)**.

5. The undersigned is filing this certificate of no objection not less than forty-eight (48) hours after the expiration of the response deadline.

6. In light of the fact that no other answer, objection or other responsive pleading to the Objection has been filed, the Plan Administrator respectfully requests that the hearing on the Objection be cancelled and that counsel for the Plan Administrator be permitted to submit to the Court a proposed Order granting the Objection for consideration and entry.

Dated: January 24, 2019
Great Neck, New York

GARFUNKEL WILD, P.C.

Counsel for the Plan Administrator and the Estates

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