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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 CERTAIN CLAIMS OBJECTED TO BY THE PLAN ADMINISTRATOR'S TWELFTH OMNIBUS OBJECTION TO THE ALLOWANCE OF CERTAIN PROOFS OF CLAIM

[Related Document 1261]

1. On February 12, 2016, 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 Twelfth Omnibus Objection to the Allowance of Certain Proofs of Claim* (the "**Omnibus Objection**") [Docket No. 1261] which seeks an Order granting objections to 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 Omnibus Objection were originally to be filed and served no later than **March 9, 2016 at 4:00 p.m.** prevailing Eastern Time. A hearing on the Omnibus Objection was originally scheduled for **March 16, 2016 at 10:00 a.m.** (**prevailing Eastern Time**).

3. Due to informal discussions with counsel to the claimant Dr. Joseph E. Casino, who filed proof of claim number 712 ("POC 712"), the hearing on the relief requested by the Omnibus Objection, with regard to POC 712, was carried and remains unresolved.

4. On December 20, 2018, council to the Plan Administrator filed and served a *Status Report* [Docket No. 1552] indicating that the hearing on the Omnibus Objection, as it relates to POC 712, would be held on **January 29, 2019 at 10:00 a.m. (prevailing Eastern Time)**.

5. The undersigned has reviewed the docket in these Chapter 11 Cases, and pursuant to the Final Order Establishing Case Management Procedures, dated July 1, 2013 [Docket No. 143], hereby certifies that no responses or objections have been received to the Omnibus Objection, with respect to POC 712.

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

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7. In light of the fact that no other answer, objection or other responsive pleading to the Omnibus Objection, as it relates to POC 712, has been filed, the Plan Administrator respectfully requests that the hearing on the Omnibus Objection be cancelled and that counsel for the Plan Administrator be permitted to submit to the Court a proposed Order granting the Omnibus Objection, with respect to POC 712, 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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