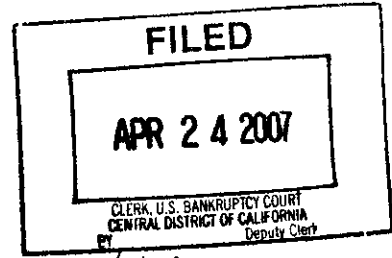


1 PETER C. ANDERSON  
 2 UNITED STATES TRUSTEE  
 3 JILL STURTEVANT, SBN 89395  
 4 ASSISTANT U.S. TRUSTEE  
 5 RUSSELL CLEMENTSON, SBN 143284  
 6 TRIAL ATTORNEY  
 7 ALVIN MAR, SBN 151482  
 8 TRIAL ATTORNEY  
 9 OFFICE OF THE UNITED STATES TRUSTEE  
 10 725 South Figueroa Street, Ste 2600  
 11 Los Angeles, California 90017  
 12 (213) 894-4219  
 13 (213) 894-2603 facsimile number



14 UNITED STATES BANKRUPTCY COURT  
 15 CENTRAL DISTRICT OF CALIFORNIA  
 16 LOS ANGELES DIVISION

17 In re  
 18 PLEASANT CARE CORPORATION,  
 19 et al.  
 20 Debtors,

21 \_\_\_\_\_  
 22 x Affects all Debtors,

23 CHAPTER 11

24 LA 07-12312-EC

25 Jointly Administered with Case  
 26 Nos.:

- 27 Case No. LA 07-12316-EC
- 28 Case No. LA 07-12319-EC
- Case No. LA 07-12322-EC
- Case No. LA 07-12326-EC

NOTICE OF APPOINTMENT  
 OF PATIENT CARE OMBUDSMAN

DATE: NO HEARING REQUIRED  
 TIME:  
 CTRM: "1639"

29 Pursuant to Federal Rules of Bankruptcy Procedure 2007.2(c) and the order directing this  
 30 appointment entered by this Court on April 20, 2007, the United States Trustee hereby appoints  
 31 as the patient care ombudsman in this case:

32 Michael E. Bubman, Esq.

33 Section 333 of the Bankruptcy Code provides that Michael E. Bubman, as the patient care  
 34 ombudsman shall:

35 (1) monitor the quality of patient care provided to patients of the Debtors, to the extent

1 necessary under the circumstances, including interviewing patients and physicians;

2 (2) not later than 60 days after the date of appointment, and not less frequently than at 60-  
3 day intervals thereafter, report to the Court after notice to the parties in interest, at a hearing or in  
4 writing, regarding the quality of patient care provided to patients of the Debtors; and

5 (3) if he determines that the quality of patient care provided to patients of the Debtors is  
6 declining significantly or is otherwise being materially compromised, file with the Court a  
7 motion or a written report, with notice to the parties in interest immediately upon making such  
8 determination.

9 (4) he shall maintain any patient information, including information related to patient  
10 records, as confidential information. He shall have access to patient records consistent with  
11 authority of such ombudsman under the Older Americans Act of 1965 and under non-Federal  
12 laws governing the State Long Term Care Ombudsman program. To have access to confidential  
13 patient records, he must obtain a court order as set forth in Federal Rule of Bankruptcy Procedure  
14 2015.1(b).

15 (5) he shall comply with the Notice provisions of Federal Rule of Bankruptcy Procedure  
16 2015.1(a) unless the court orders otherwise.

17 Attached hereto as Exhibit 1 is the verified statement of disinterestedness of Michael E.  
18 Bubman, required by Federal Rule of Bankruptcy Procedure 2007.2(c).

19 Dated: 4-24-07

20 

21 PETER C. ANDERSON  
22 United States Trustee  
23  
24  
25  
26  
27  
28

# **EXHIBIT 1**

1 Michael E. Bubman, Esq. (State Bar No. 143468)  
Horgan, Rosen, Beckham & Coren, LLP  
2 23975 Park Sorrento, Suite 200  
Calabasas, California 91302  
3 Tel: (818) 591-2121  
Fax: (818) 591-3838  
4 Email Address: mbubman@horganrosen.com  
Proposed Patient Care Ombudsman  
5

6  
7 UNITED STATES BANKRUPTCY COURT  
8 CENTRAL DISTRICT OF CALIFORNIA  
9 LOS ANGELES DIVISION  
10

11 In re  
PLEASANT CARE CORPORATION, a  
California corporation  
12  
13 In re  
SNF PROPERTIES INCORPORATED, a  
California corporation  
14  
15 In re  
PCC HEALTH SERVICES, INC., a  
California corporation  
16  
17 In re  
ATLAS CARE ENTERPRISES, INC., a  
California corporation  
18  
19 In re  
EMBER CARE CORPORATION, a  
California corporation  
20  
21 Debtor(s)  
22

Main Case No.: LA 07-12312-EC

Case No. LA-07-12322-EC  
Case No. LA-07-12319-EC  
Case No. LA-07-12326-EC  
Case No. LA-07-12316-EC

Chapter 11

VERIFIED STATEMENT RE  
DISINTERESTEDNESS OF  
MICHAEL E. BUBMAN RE  
PATIENT CARE OMBUDSMAN

23 DECLARATION OF MICHAEL E. BUBMAN

24 I, Michael E. Bubman, hereby declare as follows:

25 1. I am over the age of eighteen years, and if called upon to testify I could and  
26 would do so competently. I have personal knowledge of the facts set forth herein, and based on  
27 that personal knowledge I assert that all such facts are true and correct to the best of my  
28 knowledge.

1           2.       I am submitting this declaration in support of an application by the United States  
2 Trustee for my appointment as a patient care ombudsman in the Chapter 11 cases of Pleasant  
3 Care Corporation, SNF Properties Incorporated, PCC Health Services, Inc., Atlas Care  
4 Enterprises, Inc. and Ember Care Corporation, collectively 'Debtors' herein, all presently jointly  
5 administered under Pleasant Care Corporation, case number LA 07-12312-EC.

6           3.       My present business address and telephone number is 23975 Park Sorrento, Suite  
7 200, Calabasas, California 91302.

8           4.       My investigation of disinterestedness prior to submitting this declaration  
9 consisted of a review of the debtor entities all past matters in which I have worked, as well as  
10 running a check through the conflict system of my law firm to determine the existence of any  
11 prior representation of any of the debtors, any entity related to the debtor, any shareholder of the  
12 debtor or any known insider of the debtor.

13           5.       To the best of my knowledge, information and belief, I have encountered one of  
14 the debtor's entities in the past. From September 2004 through approximately February 2005, I  
15 was counsel for Ermel Don Doyle, Jr., who at that time, was appointed by the Department of  
16 Health Services of the State of California ("DHS") to serve as the Temporary Manager of  
17 Pleasant Care Napa. The licensee of this facility was Pleasant Care Corporation, one of the  
18 debtors in this bankruptcy proceeding. I provided advice to Mr. Doyle on questions pertaining  
19 to health care matters, as well as assisting in writing of reports provided to DHS. I had no direct  
20 involvement with anyone on the board of that particular Debtor or any employee or agent of the  
21 Debtor. Other than as set forth herein, to the best of my knowledge, information and belief, I  
22 have no other prior connection with the Debtors, principals of the Debtors, insiders of the  
23 Debtors, the Debtors' creditors, any other party in interest, and their respective attorneys and  
24 accountants, or any person employed in the Office of the United States Trustee.

25           6.       I am not a creditor, an equity security holder or an insider of the Debtors.

26           7.       I am not and have not been an investment banker for any outstanding security of  
27 the Debtors.  
28

1           8.       I have not been within three (3) years before the date of the filing of the  
2 bankruptcy petitions herein, an investment banker for a security of the Debtors, or an attorney  
3 for such an investment banker in connection with the offer, sale or issuance of any security of  
4 the Debtors.

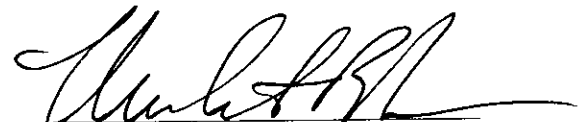
5           9.       I am not and have not been, within two (2) years before the date of the filing of  
6 the Debtors' bankruptcy petitions, a director, officer or employee of the Debtors or of any  
7 investment banker for any security of the Debtors.

8           10.      To the best of my knowledge, information and belief, I neither hold nor represent  
9 any interest materially adverse to the interest of the estates or of any class of creditors or equity  
10 holders, by reason of any direct or indirect relationship to, connection with, or interest in, the  
11 Debtors or an investment banker for any security of the Debtors, or for any other reason.

12           11.      To the best of my knowledge, information and belief, I am not a relative or  
13 employee of the United States Trustee or of any Bankruptcy Judge.

14           I declare under penalty of perjury that the foregoing is true and correct and that this  
15 declaration was executed in Los Angeles, California.

16  
17 Dated: April 23, 2007

  
Michael E. Bubman

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28

1  
2 PROOF OF SERVICE BY MAIL

3 STATE OF CALIFORNIA  
4 COUNTY OF LOS ANGELES

5 I am employed in the County of Los Angeles, state of California, in the Office of the Unites  
6 States Trustee under the supervision of a member of the bar of this Court at whose direction the  
7 service hereinafter described was made; I am over the age of 18 and not a party to the within  
8 action; and my business address is: 725 South Figueroa Street, Suite 2600, Los Angeles  
9 California 90017.

10 On April 24, 2007, I served the foregoing document described as: **NOTICE OF**  
11 **APPOINTMENT OF PATIENT CARE OMBUDSMAN** on the interested parties at their last  
12 known address in the action by placing a true and correct copy thereof in a sealed envelope with  
13 sufficient postage thereon full prepaid, in the United States Mail at Los Angeles, California,  
14 addressed as follows:

15 DEBTORS:

16 Pleasant Care Corporation  
17 2258 Foothill Boulevard  
18 La Canada, CA 91011

19 DEBTORS' ATTORNEY:

20 Ron Bender, Esq.  
21 Levene, Neale, Bender, Rankin & Brill, LLP  
22 10250 Constellation Blvd., Ste 1700  
23 Los Angeles, CA 90067

24 ATTYs FOR BRIDGE HEALTHCARE FINANCE:

25 Michael Gerard Fletcher, Esq.  
26 Frandzel, Robins Bloom & Csato, LLC  
27 6500 Wilshire Boulevard, 17<sup>th</sup> Floor  
28 Los Angeles, CA 90048-4920

Eric S. Prezant, Esq.

29 Vedder Price Kaufman & Kammholz, PC  
30 222 North LaSalle Street, Ste 2600  
31 Chicago, IL 60601-1003

32 ATTYs FOR OMNI:

33 Theodore B. Stolman, Esq.  
34 Stutman Treister & Glatt  
35 1901 Avenue of the Stars, 12<sup>th</sup> Floor  
36 Los Angeles, CA 90067-6013

1 ATTYS FOR CREDITOR'S COMMITTEE:

Richard M. Pachulski, Esq.  
2 Samuel R. Maizel, Esq.  
Pachulski, Stang, Ziehl et al.  
3 10100 Santa Monica Blvd., Ste 1100  
Los Angeles, CA 90067

4 ATTYS FOR SEIU UNITED HEALTHCARE WORKERS WEST:

5 Christian L. Raisner, Esq.  
Weinberg, Roger & Rosenfeld  
6 1001 Marina Village Parkway, Ste 200  
Alameda, CA 94501-1091

7 ATTYS FOR THE UNITED STATES OF AMERICA:

8 Catherine Bauer, Esq.  
Assistant United States Attorney  
9 Office of the U.S. Attorney  
300 North Los Angeles Street, #7516  
10 Los Angeles, CA 90012

11 COUNSEL FOR GOLDEN WEST TRADING INC.:

Andrew A. Goodman, Esq.  
12 Law Offices of Andrew Goodman, P.C.  
200 N. Westlake Blvd., Ste 202  
13 Westlake Village, CA 91362

14 REQUEST FOR NOTICE:

Michael Tuchin, Esq.  
15 Klee Tuchin Bogdanoff & Stern LLP  
1999 Avenue of the Stars, 39<sup>th</sup> Floor  
16 Los Angeles, CA 90067

17 ATTYS FOR SECURED CREDITOR, FAR EAST NATIONAL BANK:

Michele Sabo Assayag, Esq.  
18 Assayag Mauss Kempton  
2915 Redhill Avenue, Ste 200  
19 Costa Mesa, CA 92626

20 ATTYS FOR CREDITOR, HEALTHCARE SERVICES GROUP, INC.:

Gerald J. McConomy, Esq.  
21 Knapp McConomy Merlie LLP  
1216 Route 113, P. O. Box 487  
22 Chester Springs, PA 19425

23 ATTYS FOR LIFEHOUSE RETIREMENT PROPERTIES, INC.:

Leslie A. Cohen, Esq.  
24 Liner, Yankelevitz, Sunshine & Regenstreif LLP  
1100 Glendon Avenue, 14<sup>th</sup> Floor  
25 Los Angeles, CA 90024

1 ATTYS FOR COVENANT CARE:

2 Ivan L. Kallick, Esq.  
3 Ileana M. Hernandez  
4 Manatt, Phelps & Phillips, LLP  
5 11355 West Olympic Boulevard  
6 Los Angeles, CA 90064

7 Andrew F. Torok, Esq.  
8 General Counsel  
9 Covenant Care  
10 27071 Aliso Creek Road, Ste 100  
11 Aliso Viejo, CA 92656

12 ATTYS FOR SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 434B:

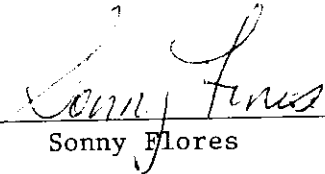
13 Dana S. Martinez, Esq.  
14 Holguin & Garfield, APLC  
15 800 West Sixth Street, Ste 950  
16 Los Angeles, CA 90017

17 ATTORNEYS FOR THE STATE OF CALIFORNIA DEPT. OF HEALTH SERVICES

18 Michele L. Wong, Esq.  
19 Deputy Attorney General  
20 California Department of Justice  
21 300 S. Spring St., 9N  
22 Los Angeles, CA 90013

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

24 Dated: April 24, 2007

25   
26 \_\_\_\_\_  
27 Sonny Flores