

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	)	Chapter 11
Whitehall Trust, et al	)	
	)	Case No. 25-15241
Debtor.	)	
	)	
	)	Joint Administration Requested
	)	
In re:	)	Chapter 11
Saucon Trust,	)	
	)	Case No. 25-15243
Debtor.	)	
	)	
	)	Joint Administration Requested
	)	
In re:	)	Chapter 11
Whitehall Manor, Inc.,	)	
	)	Case No. 25-15244
Debtor.	)	
	)	
	)	Joint Administration Requested
	)	
In re:	)	
Saucon Manor, Inc.,	)	Chapter 11
	)	
Debtor.	)	Case No. 25-15245
	)	
	)	
	)	Joint Administration Requested
	)	

**MOTION OF THE DEBTORS FOR AN ORDER DIRECTING
JOINT ADMINISTRATION OF THEIR RELATED CHAPTER 11 CASES**

The above-captioned debtors (collectively, the "Debtors") hereby move the Court, pursuant to this motion (this "Motion"), for the entry of an order, substantially in the form attached hereto as Exhibit A, directing joint administration of their related chapter 11 cases. In support of this Motion, the Debtors respectfully state as follows:

JURISDICTION

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are section 105(a) of the Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

BACKGROUND

4. On the date hereof (the "Petition Date"), the Debtors each filed a petition for relief under Chapter 11 of title 11 of the Bankruptcy Code. The Debtors are operating their businesses and managing their property as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. As of the date of the filing of this Motion, no official committee of unsecured creditors, trustee, or examiner has been appointed or designated in these cases.

The Debtors' Operations

6. Concurrently with the filing of this Motion, the Debtors have sought procedural consolidation and joint administration of these Chapter 11 Cases.

7. Whitehall Manor, Inc. ("Whitehall") and Saucon Valley Manor, Inc. ("SVM," and, together with Whitehall, the "Manors") are Pennsylvania S-corporations. Through their missions, the Manors operate award winning senior living facilities at properties owned by Whitehall Trust and Saucon Trust (collectively, the "Trusts"). Real property located at 1177 Sixth Street, Whitehall Township, PA is held in trust by Whitehall Trust and real property located at 1050 Main Street, Hellertown PA is held in trust by Saucon Trust. The Trusts lease the properties to Whitehall and SVM, respectively, and Whitehall and SVM operate their Manors at those locations.

8. The Manors are classified as Personal Care Homes (“PCH”) regulated under 55 PA Code 2600. PCHs are not designed for seniors to age in place, which distinguish such facilities from Assisted Living Communities (“ALC”) and Skilled Nursing Facilities (“SNF”). PCHs are not required by regulation, for example, to have nurses or doctors on staff or to provide transportation, unlike ALCs and SNFs. Residents with increased care needs are not eligible for PCH.

9. The Manors’ residents are private pay. The Manors provide 24-hour supervision for adults and help with the tasks of daily living such as bathing, dressing, medication assistance, and meal preparation. Available services are based on the resident’s needs after an evaluation.

10. Operations will continue in the ordinary course and will continue to be supported by the loans from the owners, subject to court approval.

11. The factual background relating to the Debtors’ commencement of these Chapter 11 Cases is set forth in detail in the First Day Declaration filed on the Petition Date and incorporated herein by reference.

RELIEF REQUESTED

12. By this Motion, the Debtors seek entry of an order directing joint administration of these chapter 11 cases for procedural purposes only. Specifically, the Debtors request that the Court maintain one file and one docket for all of the jointly-administered cases and that the cases be administered under a consolidated caption, as follows:

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Whitehall Trust, et al., ¹	)	Chapter 11
	)	Case No. 25-15241
	)	
Debtors.	)	Jointly Administered

¹ The Debtors in these Chapter 11 Cases are: (i) Whitehall Trust; (ii) Saucon Trust; (iii) Whitehall Manor, Inc. (5606); (iv) Saucon Valley Manor, Inc. (2894).

13. The Debtors request that the Court's order require that any creditor filing a proof of claim against any of the Debtors or their respective estates shall fall such proof of claim in the particular bankruptcy case of the Debtor against which such claim is asserted and not in the jointly administered case.

14. The Debtors also request that a docket entry, substantially similar to the following, be entered on each Debtor's case docket (other than Whitehall Trust) to reflect the joint administration of these chapter 11 cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing joint administration of the Chapter 11 Cases of Whitehall Trust, Saucon Trust, Whitehall Manor, Inc., and Saucon Trust, Inc. All further pleadings and other papers shall be filed in, and all further docket entries shall be made in, Case No. 25-15241.

BASIS FOR RELIEF

15. Bankruptcy Rule 1015(b) provides, in pertinent part, that "[i]f ... two or more petitions are pending in the same court by or against ... a debtor and an affiliate, the court may order a joint administration of the estates." Fed. R. Banks. P. 1015(b). The Debtors are "affiliates" as that term is defined under section 101(2)(C) and 101(2)(D) of the Bankruptcy Code. Accordingly, this Court is authorized to grant the relief requested herein.

16. Section 105(a) of the Bankruptcy Code also provides this Court with the power to grant the relief requested herein by the Debtors. Section 105(a) states that a bankruptcy court "may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a).

17. The entry of joint administration orders in multiple related cases is common and generally non-controversial in this circuit. *See, e.g., In re Wordsworth Academy, et al.*, Case No.

17-14463 (AMC).

18. Joint administration of these Chapter 11 Cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many of the motions, hearings and orders that will arise in these Chapter 11 Cases will jointly affect each Debtor. Entry of an order directing joint administration of these cases will permit the Debtors to reduce fees and costs in connection with the administration of these cases by avoiding the duplication of efforts associated with, for example, filing multiple duplicative documents in the Debtors' various individual cases, monitoring each of the Debtors' individual dockets and maintaining individual case files for each of the Debtors that will largely duplicate one another. In addition, the ability of parties in interest to monitor these cases will be facilitated by having all pleadings grouped together on one docket. Joint administration also will relieve the Court of the burden of entering duplicative orders and maintaining duplicative files. Finally, supervision of the administrative aspects of these Chapter 11 Cases by the Office of the United States Trustee for the Eastern District of Pennsylvania will be simplified.

19. The joint administration of these Chapter 11 Cases will not adversely affect the Debtors' respective creditors because this Motion requests only administrative, and not substantive, consolidation of the estates. For example, any creditor may still file a claim against a particular Debtor or its estate (or against multiple Debtors and their respective estates), intercompany claims among the Debtors will be preserved and the Debtors will maintain separate records of assets and liabilities. Thus, individual creditors' rights will not be harmed by the relief requested; rather, the constituents will benefit from the cost reductions associated with the joint administration of these cases.

20. Based on the foregoing, the Debtors submit that the joint administration of these Chapter 11 Cases is in the best interests of the Debtors, their creditors and all other parties in interest.

21. For all of the foregoing reasons, the Debtors respectfully request the immediate entry of an order providing for the joint administration of the Debtors' Chapter 11 Cases.

NOTICE

22. The Debtors also request that the notice period be reduced accordingly to allow the hearing to proceed on the date and time scheduled by this Court. In addition, in light of the relief requested in the Motion, the Debtors request that notice be limited to: (a) the Office of the United States Trustee for the Eastern District of Pennsylvania; (b) the Commonwealth of Pennsylvania, Department of Labor and Industry; (c) the Commonwealth of Pennsylvania, Department of Revenue; (d) the Office of the Attorney General of Pennsylvania; (e) the entities listed on the Consolidated List of Creditors Holdings the 20 Largest Unsecured Claims filed pursuant to Bankruptcy Rule 1007(d); (f) Internal Revenue Service; (g) Duane Morris; (h) Truist Bank; (i) Whitehall Township Tax Office (j) Commonwealth of Pennsylvania, Department of Human Services; (k) Whitehall Coplay School District; (l) Borough of Hellertown; (m) County of Northhampton; (n) Saucon School District (o) Lehigh Valley LLC I; (p) Portnoff Law & Associates; (q) Office of the United States Attorney General for the Eastern District of Pennsylvania; and (r) all parties who have requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Debtors respectfully submit that no further notice is necessary.

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as Exhibit A, (a) authorizing the joint administration of these Chapter 11 Cases and (b) granting such other and further relief as is just and proper.

Dated: December 26, 2025
Philadelphia, Pennsylvania

/s/ Michelle V. Lee
DILWORTH PAXSON LLP

Lawrence G. McMichael
Anne M. Aaronson
Michelle V. Lee
1650 Market St., Suite 1200
Philadelphia, PA 19103
Telephone: (215) 575-7000
Facsimile: (215) 575-7200
Email: lmcmichael@dilworthlaw.com
aaaronson@dilworthlaw.com
mlee@dilworthlaw.com

Proposed Counsel for the Debtors and Debtors-in-Possession

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	)	Chapter 11
Whitehall Trust, et al	)	
	)	Case No. 25-15241
Debtor.	)	
	)	
	)	Joint Administration Requested
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In re:	)	Chapter 11
Saucon Trust,	)	
	)	Case No. 25-15243
Debtor.	)	
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Whitehall Manor, Inc.,	)	
	)	Case No. 25-15244
Debtor.	)	
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In re:	)	
Saucon Manor, Inc.,	)	Chapter 11
	)	
Debtor.	)	Case No. 25-15245
	)	
	)	
	)	Joint Administration Requested
	)	

**ORDER DIRECTING JOINT ADMINISTRATION
OF THE DEBTORS' RELATED CHAPTER 11 CASES**

Upon the Motion of the Debtors for an Order Directing Joint Administration of Their Related Chapter 11 Cases (the “Motion”) of the above-captioned debtors (collectively, the “Debtors”) for the entry of an order directing the joint administration of the Debtors’ related Chapter 11 Cases; it appearing that the relief requested is in the best interests of the Debtors’ estates, their creditors and other parties in interest; the Court having jurisdiction to consider

the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); venue being proper before this court pursuant to 28 U.S.C. §§ 1408 and 1409; notice of the Motion having been adequate and appropriate under the circumstances; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Motion is granted as set forth herein.
2. The above-captioned Chapter 11 Cases are consolidated for procedural purposes only and shall be jointly administered by the Court.
3. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting the substantive consolidation of the Debtors' Chapter 11 Cases.
4. The caption of the jointly administered cases should read as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Whitehall Trust, et al., ¹	)	Chapter 11
	)	Case No. 25-15241
	)	
Debtors.	)	Jointly Administered

¹ The Debtors in these Chapter 11 Cases are: (i) Whitehall Trust; (ii) Saucon Trust; (iii) Whitehall Manor, Inc. (5606); (iv) Saucon Valley Manor, Inc. (2894).

5. Any creditor filing a proof of claim against any of the Debtors or their respective estates shall fall such proof of claim in the particular bankruptcy case of the Debtor against which such claim is asserted and not in the jointly administered case.
6. A docket entry shall be made in each of the above-captioned cases substantially as follows:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing joint administration of the Chapter 11 Cases of Whitehall Trust, Saucon Trust, Whitehall Manor, Inc., and Saucon Trust, Inc. All further pleadings and other papers shall be filed in, and all further docket entries shall be made in, Case No. 25- 15-245 .

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.
8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
9. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).
10. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: _____

Honorable Patricia Mayer