

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

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In re:	:	Chapter 11
	:	
Whitehall Trust, et. al.,	:	Case No. 25-15241 (PMM)
	:	(Jointly Administered)
Debtors.	:	
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**NOTICE OF APPOINTMENT OF PATIENT CARE OMBUDSMAN
UNDER 11 U.S.C. § 333**

Pursuant to Section 333 of the Bankruptcy Code, Rule 2007.2(c) of the Federal Rules of Bankruptcy Procedure, and the Order Directing the Appointment of a Patient Care Ombudsman entered on January 28, 2026 (D.I. 145) (the “Order”), Andrew R. Vara, United States Trustee for Region 3, hereby appoints MARGARET BARAJAS to serve as the Patient Care Ombudsman in the cases of Whitehall Manor, Inc., Case No. 25-15244 (PMM) and Saucon Manor, Inc., Case No. 25-15245 (PMM), jointly administered together under above-captioned case as the lead case. Ms. Barajas’ verified statement pursuant to Federal Rule of Bankruptcy Procedure 2007.2(c) is attached as Exhibit A.

Section 333 of the Bankruptcy Code provides that the Patient Care Ombudsman shall:

- (1) monitor the quality of patient care provided to patients of the debtor, to the extent necessary under the circumstances, including interviewing patients and physicians;
- (2) not later than 60 days after appointment (and not less frequently than at 60 day intervals thereafter), report to the Court after notice to the parties in interest, at a hearing or in writing, regarding the quality of patient care provided to patients of the debtor as per the Order;
- (3) if the ombudsman determines that the quality of patient care provided to patients of the debtor is declining significantly or is otherwise being materially

compromised, file with the Court a motion or a written report, with notice to the parties in interest immediately upon making such determination; and

- (4) maintain any information obtained by such ombudsman under Section 333 of the Bankruptcy Code that relates to patients (including information relating to patient records) as confidential information. Such ombudsman may not review confidential patient records unless the Court approves such review in advance and imposes restrictions on such ombudsman to protect the confidentiality of such records.

Federal Rule of Bankruptcy Procedure 2015.1 provides that the Patient Care Ombudsman shall file reports:

A patient care ombudsman, at least 14 days before making a report under § 333(b)(2) of the Code, shall give notice that the report will be made to the court, unless the court orders otherwise. The notice shall be transmitted to the United States trustee, posted conspicuously at the health care facility that is the subject of the report, and served on: the debtor; the trustee; all patients; and any committee elected under § 705 or appointed under § 1102 of the Code or its authorized agent, or, if the case is a chapter 9 municipality case or a chapter 11 reorganization case and no committee of unsecured creditors has been appointed under § 1102, on the creditors included on the list filed under Rule 1007(d); and such other entities as the court may direct. The notice shall state the date and time when the report will be made, the manner in which the report will be made, and, if the report is in writing, the name, address, telephone number, email address, and website, if any, of the person from whom a copy of the report may be obtained at the debtor's expense.

Respectfully submitted,

ANDREW R. VARA
United States Trustee, Regions 3 & 9

/s/Rachel Wolf
Rachel Wolf, Trial Attorney

Dated: February 2, 2026

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VERIFIED STATEMENT OF MARGARET BARAJAS

I hereby verify that I have no connections with the above-captioned debtor and jointly administered debtors, creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, except as follows: **(If you have no connections, write “none”).**

None.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATE: February 2, 2026

/s/Margaret Barajas
Margaret Barajas

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**PATIENT CARE OMBUDSMAN'S ACKNOWLEDGMENT
OF PRIVACY OBLIGATIONS UNDER 11 U.S.C. § 333(c)**

I, Margaret Barajas, acknowledge that Section 333(c) of the Bankruptcy Code requires that I maintain the confidentiality of information relating to patients (including information relating to patient records) which I obtain during my appointment as a patient care ombudsman pursuant to Section 333(a)(2)(A). Furthermore, I hereby acknowledge that I shall comply with such requirements.

/s/ Margaret Barajas
Margaret Barajas
Patient Care Ombudsman

February 2, 2026
Date