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

In re:	Chapter 11
Whitehall Manor, et al.,[1]	Case No. 25-15245 (PMM)
Debtors.	Jointly Administered

APPLICATION PURSUANT TO 11 U.S.C. § 327(a) OF THE BANKRUPTCY CODE FOR AUTHORITY TO EMPLOY ROBINSON & COLE LLP AS COUNSEL FOR WHITEHALL TRUST AND SAUCON TRUST, EFFECTIVE *NUNC PRO TUNC* TO MAY 20, 2026

Whitehall Trust and Saucon Trust (the "Trusts"), hereby file this application (the "Application") pursuant to 327(a) and 328(a) of title 11 of the United States Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure, and Rule 2014-1 of the Local Rule of Bankruptcy Procedure. The Trusts further seek the entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), authorizing and approving the employment of Robinson & Cole LLP ("R+C") as counsel for the Trusts pursuant to 11 U.S.C. § 327(a), *nunc pro tunc* to May 20, 2026 (as defined below). In support of this Application, the Trusts submit and incorporate by reference the verified statement of Rachel Jaffe Mauceri a partner of R+C (the "Mauceri Statement"), attached hereto as **Exhibit B**. In further support of this Application, the Trusts respectfully state as follows:

[1] The Debtors in these Chapter 11 Cases are: (i) Whitehall Manor, Inc (5606); and (ii) Saucon Valley Manor, Inc. (2894). On March 19, 2026, this Court entered an order [D.I. 25] granting the motion to dismiss Whitehall Trust and Saucon Trust (the "Trusts") as debtors in these jointly administered chapter 11 cases. Pursuant to an order of this Court dated April 2, 2026 [D.I. 67], the dismissals of the Trusts have been stayed pending appeal and the Trusts remain debtors in these jointly administered cases.

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 December 26, 2025 (the "Petition Date"), each of the Debtors filed a petition for relief under Chapter 11 of title 11 of the Bankruptcy Code.

5. 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.

6. No official committee of unsecured creditors has been appointed in these Chapter 11 Cases.

7. On March 20, 2026, this Court dismissed the Chapter 11 Cases filed by Debtors Whitehall Trust and Saucon Trust. This Court entered an order on April 2, 2026, staying the effectiveness of the dismissal order pending appeal. The Trusts are awaiting a decision by the Third Circuit Court of Appeals whether it will authorize a direct appeal of the dismissal order. The Trusts intend to seek expedited consideration of the appeal once the direct appeal is authorized. If not authorized, the Trusts will move as expeditiously as possible in the District Court to resolve the Dismissal Order Appeal, seeking further expedited appellate review by the Third Circuit Court of Appeals, if necessary.

8. On May 15, 2026, the Debtors filed the Plan and Disclosure Statement.

9. On May 18, 2026, the United States District Court for the Eastern District of Pennsylvania vacated this Court's prior order approving the retention of Dilworth Paxson LLP as counsel for all four Debtors and held that the Trusts and the operating Debtors must obtain separate counsel. The Trusts intend to appeal the District Court's order.

10. In the meantime, in light of both appeals, the Trusts have retained R+C to serve as their bankruptcy counsel so that there is no loss of momentum in either these cases or the related appellate proceedings. Immediate action is required, among other things, to substitute counsel and enter appearances in this Court, the District Court, and the Third Circuit, to prosecute or defend matters affecting the Trusts' interests, and to address issues arising from ongoing lease arrangements and plan-related matters. Accordingly, the Trusts are filing this application in light of the stay of the dismissal, and in the event the dismissal of the Trusts is reversed and the disqualification of the operating Debtors counsel is upheld.

11. The Debtors (including the Trusts) have filed a joint plan and disclosure statement that contemplates alternative treatment depending on whether the Trusts remain debtors. The Trusts therefore continue to have a direct and substantial interest in the administration of these chapter 11 cases and in the outcome of the pending appeals.

12. The Trusts submit that the employment of R+C is necessary and in the best interests of the Trusts and their estates.

13. 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.

THE DEBTORS' OPERATIONS

14. 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 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.

15. 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 distinguishes 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.

16. 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 residents' needs after an evaluation.

RELIEF REQUESTED

17. By this Application, the Trusts seek authority to employ and retain R+C as their bankruptcy counsel *nunc pro tunc* to May 20, 2026. For the reasons set forth herein, the Trusts' request to retain R+C as bankruptcy counsel is warranted by the circumstances of these Chapter 11 Cases.

R+C's QUALIFICATIONS

18. The Trusts have selected R&C as their bankruptcy counsel because of the firm's extensive knowledge, expertise, and experience in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. R&C's knowledge, expertise, and experience practicing before the Court will enable the firm to work in an efficient and cost-

effective manner on behalf of the Trusts' estates. In preparing for the Cases, R&C has become familiar with the Debtors' business and affairs and many of the potential legal issues that may arise in the context of the Cases. Accordingly, the Trusts believe that R&C is well-qualified to represent them as bankruptcy counsel in these Cases.

SERVICES TO BE PROVIDED

19. The Trusts seek to retain R+C as their counsel for all matters relating to these chapter 11 cases and related appellate proceedings pursuant to section 327(a) of the Bankruptcy Code.

20. Subject to this Court's approval and further order, R+C will render such legal services as are necessary in these cases, including the following:

(a) advise the Trusts regarding their rights, powers, and duties as debtors-in-possession (to the extent applicable);

(b) prepare on behalf of the Trusts or assist the Trusts in preparing all necessary pleadings, motions, applications, complaints, answers, responses, orders, United States Trustee reports, and other legal papers, including appeals;

(c) advise the Trusts concerning, and assist in the negotiation and documentation of, the use of cash collateral and/or debtor-in-possession financing, debt restructuring and related transactions;

(d) review the nature and validity of agreements relating to the Trusts' business and advise the Trusts in connection therewith;

(e) review the nature and validity of liens, mortgages, leases, and other agreements affecting the Trusts' properties and advise the Trusts concerning the enforceability and treatment of such interests;

(f) assist the Trusts in any disputes with secured or unsecured creditors, including matters concerning dismissal, stay relief, lease issues, retention, and appellate relief;

(g) advise the Trusts concerning the actions they might take to collect and recover property for the benefit of their estates;

(h) assist the Trusts in any matter involving contests with secured or unsecured creditors, including the claims reconciliation process;

(i) assist the Trusts in providing legal services required to prepare, negotiate and implement a plan or plans of reorganization; and

(j) perform all other legal services for the Trusts which may be necessary in the administration of this case, other than those requiring specialized expertise for which special counsel, if necessary, may be employed.

21. R+C has indicated its willingness to serve as counsel for the Trusts and to perform the services described herein, and will coordinate with the Manors' counsel to the extent necessary to avoid any duplication of efforts by counsel in these chapter 11 cases.

22. To the best of the Trusts' knowledge, R+C does not have any connection with or interest adverse to the Debtors, the Debtors' creditors, any other party-in-interest, or the Office of the United States Trustee (including its attorneys).

23. R+C represents no interest adverse to the Debtors or their estates in the matters upon which it is to be engaged as attorneys for the Debtors and is a disinterested person within the meaning of § 101(14) of the Bankruptcy Code.

24. The Trusts, subject to the provisions of the Bankruptcy Code, and the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), propose to pay R+C its customary hourly rates in effect from time to time.

25. The Trusts understand that R+C hereafter intends to apply to the Court for allowances of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules and the local rules and orders of this Court for all services performed and expenses incurred after the Petition Date.

26. The Trusts believe that the retention and employment of R+C would be in the best interest of the Debtors, the Debtors' estates and all parties-in-interest.

PROFESSIONAL COMPENSATION

27. Subject to Court approval, in accordance with Bankruptcy Code sections 330(a) and 331, compensation will be payable to R+C on an hourly basis, plus reimbursement of actual necessary expenses incurred by the Firm. The attorneys and paralegal presently designated to represent the Debtors are:

Name	Title	Hourly Rate
Natalie Ramsey	Partner	$2200
Rachel Jaffe Mauceri	Partner	$1350
Eric Del Pozo	Partner	$1120
Evan Lazerowitz	Counsel	$1160
Amanda Donato	Associate	$525
Kenneth Brayboy	Paralegal	$540
Alyssa Merkey	Paralegal	$540

28. It is anticipated that other R+C attorneys or paraprofessionals will provide legal services on behalf of the Trusts in connection with the matters described herein. The current range of rates of R+C partners, counsel, associates, and paralegals are as follows:

Title	Hourly Rate
Partners/Counsel	$1160-$2200
Associates	$525-$760
Paralegals	$460-$540

29. The hourly rates set forth above are R+C's standard hourly rates for work of this nature and are consistent with market rates for comparable services. These rates are set at a level designed to compensate fairly R+C for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses.

30. These hourly rates are subject to periodic adjustments, typically in January of each year, to reflect economic and other conditions. R+C will maintain detailed records of actual and necessary costs and expenses incurred in connection with the legal services described above.

31. In addition to the hourly rates set forth above, it is R+C's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, telephone and telecopier (outgoing only) toll and other charges, mail and express mail charges, special or hand delivery charges, photocopying charges, printing and scanning charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by R+C to outside copying services for use in mass mailings, travel expenses, after-hours taxi/Uber expenses, expenses for working meals or overtime/after-hours meals, computerized research charges, transcription costs, as well as non-ordinary overhead expenses such as secretarial and other overtime. R+C will charge for these expenses in a manner and at rates consistent with charges made generally to R+C's other clients and the Local Rules.

R+C's DISCLOSURE REGARDING RETENTION

32. The standard for a debtor-in-possession to employ attorneys as bankruptcy counsel is set forth in section 327(a) and 1107 of the Bankruptcy Code. Those sections provide that a debtor-in-possession, with the Court's approval, may employ attorneys "that do not hold or represent an interest adverse to the estate," and that are "disinterested persons." 11 U.S.C. §§ 327(a) & 1107; *see also In re BH&P, Inc.*, 949 F.2d 1300, 1314 (3d Cir. 1991) (citing *In re Star Broadcasting, Inc.*, 81 B.R. 835, 838 (Bankr. D.N.J. 1988) (for counsel to be retained, "counsel must 'not hold or represent an interest adverse to the estate' and must be a 'disinterested person'")). In general, subject to the requirements of section 327(a) and 1107, a debtor-in-possession is entitled to the counsel of its choosing. *See e.g., In re Vouzianas*, 259 F.3d 103,112 (2d Cir. 2001)

(observing that "[o]nly in the rarest cases should the trustee be deprived of the privilege of selecting his own counsel").

33. As described in the Mauceri Statement, R+C has conducted a detailed search of its conflict database with respect to the Debtors and potential parties in interest in these Chapter 11 Cases.

***NUNC PRO TUNC* APPROVAL**

34. The Third Circuit has identified "time pressure to begin service" and absence of prejudice as factors favoring *nunc pro tunc* retention. *See Matter of Arkansas Co.*, 798 F.2d 645, 650 (3d Cir. 1986). The complexity and speed that have characterized these chapter 11 cases and the imminent nature of the appeals has necessitated that the Trusts, R+C, and the Debtors' other professionals focus their immediate attention on time-sensitive matters and promptly devote substantial resources to the Trusts' affairs pending submission and approval of this Application. Upon information and belief, no party in interest would be prejudiced by the granting of the relief requested herein on a *nunc pro tunc* basis.

NOTICE

35. Notice of this Motion has been or will be given to (a) the Office of the United States Trustee for the Eastern District of Pennsylvania; (b) the Commonwealth of Pennsylvania Department of Revenue; (c) all local taxing authorities; (d) the Internal Revenue Service; (e) the entities listed on the Consolidated List of Creditors Holding the 20 Largest Unsecured Claims filed by the Debtors pursuant to Bankruptcy Rule 1007(d); (f) the Debtor's secured lender; (g) the banks in which the Debtors maintain their bank accounts; and (h) all parties who, as of the filing of this Motion, have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002. The Trusts submit that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

36. No prior motion for the relief requested herein has been made to this or any other Court.

WHEREFORE, based on the facts and disclosures above, the Trusts respectfully request that the Court enter an Order, substantially in the form submitted herewith, (i) granting the Application and authorizing the Trusts to employ R+C as their bankruptcy counsel pursuant to section 327(a) of the Bankruptcy Code, *nunc pro tunc* to the Petition Date, on the terms and conditions set forth in this Application; and (ii) granting such other relief as may be just and proper.

Dated: June 3, 2026

Respectfully submitted,

SAUCON TRUST
WHITEHALL TRUST

/s/ Abraham Atiyeh
By: Abraham Atiyeh
Title: Manager

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

In re: Whitehall Manor, et al.,[1] Debtors.	Chapter 11 Case No. 25-15245 (PMM) Jointly Administered

NOTICE OF APPLICATION PURSUANT TO 11 U.S.C. § 327(a) OF THE BANKRUPTCY CODE FOR AUTHORITY TO EMPLOY ROBINSON & COLE LLP AS COUNSEL FOR WHITEHALL TRUST AND SAUCON TRUST, EFFECTIVE *NUNC PRO TUNC* TO MAY 20, 2026

PLEASE TAKE NOTICE that Whitehall Trust and Saucon Trust (the "Trusts"), have filed an application seeking employment of Robinson & Cole LLP as counsel (the "Application") with the United States Bankruptcy Court for the Eastern District of Pennsylvania (the "Court").

1. Any party receiving this Notice may file an answer, objection, or other responsive pleading to the Application with the Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania, The Gateway Building, Fourth Floor, 201 Penn Street, Reading, Pennsylvania 19601 on or before seven (7) days from the date of this Notice.

2. A copy of any answer, objection or other responsive pleading filed with respect to the Application must also be served upon: (i) the Trusts' proposed counsel, Robinson & Cole LLP, 1650 Market Street, Suite 3030, Philadelphia, PA 19103. (Attn: Rachel Jaffe Mauceri) and (Attn: Natalie Ramsey); and (ii) Office of The United States Trustee, 900 Market Street, Suite 320, Philadelphia, PA 19107 (Attn: Rachel Wolf).

3. In the absence of any answer, objection, responsive pleading or request for hearing, the undersigned will certify same to the Court and request that an Order be entered granting the Application

Dated: June 3, 2026

/s/ *Rachel Jaffe Mauceri*
Natalie D. Ramsey, Esquire
Rachel Jaffe Mauceri, Esquire
ROBINSON & COLE LLP
1650 Market Street, Suite 3030
Philadelphia, PA 19103
Tel.: (215) 398-0600
nramsey@rc.com
rmauceri@rc.com

[1] The Debtors in these Chapter 11 Cases are: (i) Whitehall Manor, Inc (5606); and (ii) Saucon Valley Manor, Inc. (2894). On March 19, 2026, this Court entered an order [D.I. 25] granting the motion to dismiss Whitehall Trust and Saucon Trust (the "Trusts") as Debtors in these jointly administered chapter 11 cases. Pursuant to an order of this Court dated April 2, 2026 [D.I. 67], the dismissals of the Trusts have been stayed pending appeal and the Trusts remain debtors in these jointly administered cases.

EXHIBIT A

Proposed Order

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

In re: Whitehall Manor, et al., Debtors.	Chapter 11 Case No. 25-15245 (PMM) Jointly Administered

ORDER (I) APPROVING THE RETENTION OF ROBINSON & COLE LLP AS COUNSEL FOR WHITEHALL TRUST AND SAUCON TRUST, RESPECTIVELY, EFFECTIVE *NUNC PRO TUNC* TO MAY 20, 2026

Upon the application (the "Application") of Whitehall Trust and Saucon Trust (together, the "Trusts"), for entry of an order (this "Order") pursuant to Sections 327(a) and 328(a) of title 11 of the United States Bankruptcy Code (the "Bankruptcy Code") and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") authorizing the Trusts to employ and retain Robinson & Cole LLP (R+C) as bankruptcy counsel for the Trusts in accordance with its normal hourly rates and disbursement policies, as is more fully set forth in the Application; and upon the Verified Statement of Rachel Jaffe Mauceri (the "Mauceri Statement"), which is attached to the Application as Exhibit B; and it appearing that the Court has jurisdiction to consider the Application; and the Court being satisfied, based upon the representations made in the Application and the Mauceri Statement, that R+C represents or holds no interest adverse to the Trusts or their estates as to the matters upon which it is to be engaged and that said firm is disinterested under the meaning of section 101(14) of the Bankruptcy Code, and that the employment of R+C is necessary and would be in the best interest of the Trusts and their estates, and that the terms of R+C's engagement set forth in the Application and the Mauceri Statement are reasonable pursuant to section 328(a) of the Bankruptcy Code, and that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and it appearing that the notice of the Application having been properly given and such notice being adequate for the entry of this Order; and it appearing that no other notice is required; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is granted.

2. Pursuant to sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rules 2014-1 and 9013-1, the Trusts are authorized to retain and employ R+C as their counsel in accordance with R+C's customary hourly rates and reimbursement policies in effect when services are rendered.

3. R+C shall apply for compensation and reimbursement of expenses in accordance with the procedures set forth in sections 330 and 331 of the Bankruptcy Rules, the applicable Bankruptcy Rules, the applicable Local Rules, the guidelines established by the U.S. Trustee, and applicable orders of this Court.

4. That compensation to R+C is only to be allowed by order of this Court upon submission of an application for compensation in conformity with the United States Bankruptcy Code, applicable Bankruptcy Rules and *In re Busy Beaver Building Center, Inc.*, 19 F.3d 833 (3rd Cir. 1994).

5. The Trusts are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: BY THE COURT:

____
Honorable Patricia M. Mayer
United States Bankruptcy Judge

EXHIBIT B

Mauceri Statement

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

In re: Whitehall Manor, et al.,[1] Debtors.	Chapter 11 Case No. 25-15245 (PMM) Jointly Administered

VERIFIED STATEMENT OF RACHEL JAFFE MAUCERI PURSUANT TO §§ 327, 329 AND 504 OF THE BANKRUPTCY CODE, AND DISCLOSURE PURSUANT TO FED. R. BANKR. P. 2014(a) AND 2016(b)

RACHEL JAFFE MAUCERI, of full age, being duly sworn according to law, upon his oath, deposes and states:

1. I submit this Verified Statement pursuant to §§ 327, 329 and 504 of the Bankruptcy Code and Fed. R. Bankr. P. 2014(a) and 2016(b) in support of the Application of Whitehall Trust and Saucon Trust (the "Trusts") for entry of an order authorizing and approving the employment of Robinson & Cole LLP as counsel to the Trusts pursuant to 11 U.S.C. § 327(a).

2. The information contained in this statement is true and correct to the best of my knowledge and belief.

3. I am a partner at the law firm of Robinson & Cole, LLP ("R+C"), located at 1650 Market Street, Suite 3030, Philadelphia, PA 19103. I have been duly admitted to practice law in the States of New Jersey, New York, and the Commonwealth of Pennsylvania and am in good standing in each of those jurisdictions.

[1] The Debtors in these Chapter 11 Cases are: (i) Whitehall Manor, Inc (5606); and (ii) Saucon Valley Manor, Inc. (2894). On March 19, 2026, this Court entered an order [D.I. 25] granting the motion to dismiss Whitehall Trust and Saucon Trust (the "Trusts") as debtors in these jointly administered chapter 11 cases. Pursuant to an order of this Court dated April 2, 2026 [D.I. 67], the dismissals of the Trusts have been stayed pending appeal and the Trusts remain debtors in these jointly administered cases.

4. On December 26, 2025 (the "Petition Date"), each of the Trusts filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

5. Unless otherwise stated in this statement, I have personal knowledge of the facts hereinafter set forth.

6. On May 20, 2026 (the "Retention Date"), R+C was retained to represent the Debtors in these bankruptcy cases.

7. R+C has completed a conflicts search with respect to (i) the Debtors (including the Trusts); (ii) the Debtors' principals; (iii) the Debtors' top twenty (20) unsecured creditors; and (iv) the other parties identified on the Debtors' parties-to-be-searched list, including the secured lender, secured claimants, receiver, United States Trustee personnel, Bankruptcy Judges and staff, banks, insurers, utilities, tax and regulatory authorities, bankruptcy professionals, and litigation parties, against R+C's current and former engagements and clients. R+C identified no potential conflicts.

8. On information and belief, based on my personal knowledge and the information currently available in the conflicts database R+C maintains in the regular course of business, neither I, R+C, nor any member, counsel or associate thereof, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or has any connection with the Debtor, their creditors or any other parties in interest herein.

DISINTERESTEDNESS

9. R+C is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, in that R+C and, to the best of my present knowledge, its members:

(a) are not creditors, equity security holders or insiders of the Trusts;

(b) are not and were not, within two years before the date of the filing of the Trusts' chapter 11 petition, directors, officers or employees of the Trusts; and

(c) do not have any interest materially adverse to the interests of the Trusts' estates or of any class of creditors or equity security holders by reason of any direct or indirect relationship to, connection with, or interest in, the Trusts as specified in subparagraph (a) or (b) of this paragraph, or for any other reason.

10. Furthermore, to the best of my knowledge, information and belief, neither I nor any member of my firm (i) is a relative of any of the judges who serve at the United States Bankruptcy Court for the Eastern District of Pennsylvania, including Judge Mayer, the presiding judge in this Case; (ii) owns any debt or equity security of the Trusts or holds any claim against the Trusts; and/or (iii) is a relative of any person employed by the Office of the United States Trustee for the Eastern District of Pennsylvania.

PROFESSIONAL COMPENSATION

11. Section 328(a) of the Bankruptcy Code authorizes the employment of a professional person on any reasonable terms and conditions of employment, including on an hourly basis. R+C intends to apply for compensation for professional services rendered in connection with this case subject to the approval of this Court and in compliance with applicable provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Rules and orders of this Court, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by R+C. R+C has advised the Trusts that the current hourly rates applicable to the principal attorneys and paralegal proposed to represent the Trusts are:

Name	Title	Hourly Rate
Natalie Ramsey	Partner	$2200
Rachel Jaffe Mauceri	Partner	$1350
Eric Del Pozo	Partner	$1120
Evan Lazerowitz	Counsel	$1160
Amanda Donato	Associate	$525
Kenneth Brayboy	Paralegal	$540
Alyssa Merkey	Paralegal	$540

12. It is anticipated that other R+C attorneys or paraprofessionals will provide legal services on behalf of the Trusts in connection with the matters described herein. The current range of rates of R+C partners, counsel, associates, and paralegals are as follows:

Title	Hourly Rate
Partners/Counsel	$1160-$2200
Associates	$525-$760
Paralegals	$460-$540

13. The hourly rates set forth above are R+C's 2026 standard hourly rates for work of this nature. These rates are subject to periodic adjustment. They are set at a level designed to fairly compensate R+C for their work and to cover fixed and routine overhead expenses.

14. In terms of expenses, it is R+C's policy to charge its clients in all areas of practice for all other expenses incurred in connection with the client's case. The expenses charged to clients include, among other things, telephone and telecopier charges, mail and express mail charges, special or hand delivery charges, document processing, photocopying charges, travel expenses, expenses for working meals, computerized research, and copying and mailing charges from outside vendors and transcription costs. R+C will charge the Trusts for these expenses in a manner and at rates consistent with charges made generally to R+C's clients. R+C intends to seek

compensation for all time and expenses associated with its retention in accordance with sections 330 and 331 of the Bankruptcy Code and any orders of this Court, including the preparation of the Application, this Statement, and related documents, as well as any monthly fee statements or interim or final fee applications.

15. Except as disclosed herein, no promises have been received by R+C, nor any other member or associate thereof, as to compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code. R+C has received no promise for compensation from any source other than the Trusts and has no agreement with any other entity to share with such entity any compensation received by R+C other than its members and associates in accordance with the operating agreement of the firm. To date, R+C has not received any retainer or compensation in respect of services to be rendered.

16. The foregoing constitutes the statement of R+C in compliance with, and to provide disclosure pursuant to, sections 327(a), 328(a), 329 and 504 of the Bankruptcy Code and Bankruptcy Rules 2014(a) and 2016 of the Bankruptcy Rules.

Dated: June 3, 2026

/s/ Rachel Jaffe Mauceri
Rachel Jaffe Mauceri

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

In re:	Chapter 11
Whitehall Manor, et al.,[2]	Case No. 25-15245 (PMM)
Debtors.	Jointly Administered

CERTIFICATE OF SERVICE

I, Rachel Jaffe Mauceri, hereby certify that true and correct copies of the *Notice of Application and Application Pursuant to 11 U.S.C. § 327(a) of the Bankruptcy Code for Authority to Employ Robinson & Cole LLP as Counsel for Whitehall Trust and Saucon Trust, Effective nunc pro tunc to May 20, 2026* were filed electronically on June 3, 2026, with the United States Bankruptcy Court and served upon all case participants via CM/ECF and upon all parties on the attached Notice 2002 Service List via email notification and/or First-Class Mail.

ROBINSON & COLE LLP

/s/ *Rachel Jaffe Mauceri*
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Rachel Jaffe Mauceri, Esquire
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Tel.: (215) 398-0600
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[2] The Debtors in these Chapter 11 Cases are: (i) Whitehall Manor, Inc (5606); and (ii) Saucon Valley Manor, Inc. (2894). On March 19, 2026, this Court entered an order [D.I. 25] granting the motion to dismiss Whitehall Trust and Saucon Trust (the "Trusts") as debtors in these jointly administered chapter 11 cases. Pursuant to an order of this Court dated April 2, 2026 [D.I. 67], the dismissals of the Trusts have been stayed pending appeal and the Trusts remain debtors in these jointly administered cases.

Whitehall Trust - Master Service List 06/02/2026

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