

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF LOUISIANA  
Lafayette Division**

**IN RE:**

**CASE NO. 16-50740**

**PROGRESSIVE ACUTE CARE, LLC, et al.**

**CHAPTER 11**

**DEBTORS**

**JOINTLY ADMINISTERED**

**MOTION FOR EXPEDITED HEARING**

**NOW INTO COURT**, through undersigned counsel, come Progressive Acute Care, LLC (“PAC”), Progressive Acute Care Avoyelles, LLC (“PAC Avoyelles”), Progressive Acute Care Oakdale, LLC (“PAC Oakdale”) and Progressive Acute Care Winn, LLC (“PAC Winn”) as debtors and debtors-in-possession (collectively, the “Debtors”), which request that the *Ex Parte Application for Entry of an Order Authorizing the Employment and Retention of the law firm of Sullivan Stolier, LC as Special Counsel* (“Application”) [P-158] be heard on an expedited basis on July 19, 2016 at 10:00 a.m., and respectfully represent as follows:

1.

On May 31, 2016 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (11 U.S.C. §§ 101 *et seq.*, the “Bankruptcy Code”).

2.

The Debtors own and operate three (3) community-based hospitals (“Hospitals”), ranging from 50-60 bed capacity, which provide inpatient, outpatient and emergency care, primarily for residents of the immediate regions of the Hospitals. The Hospitals are located in Marksville (PAC Avoyelles), Oakdale (PAC Oakdale) and Winnfield (PAC Winn).

3.

The Debtors seek authority to employ Sullivan Stolier, LC (“Sullivan”) to represent the Debtors with respect to the preparation of various documents required for a sale of the Hospitals and advising the Debtors on the regulatory compliance requirements under various state and federal health care laws and statutes.

4.

The Debtors seek an expedited hearing on the Application as it is imperative Sullivan begin necessary research and preparation of documents in order to properly advise the Debtors during the course of the prospective sale of the Hospitals.

5.

Counsel for the Debtors has contacted counsel for the Unsecured Creditors’ Committee who has no objection to the relief requested herein. Undersigned counsel also attempted to contact counsel for the Office of the United States Trustee, but understands such counsel is out of town and thus no response has yet been submitted as of the filing of this Application.

6.

Notice of this motion has been served upon i) the Debtors, through their counsel of record, ii) the Office of the United States Trustee; iii) secured creditors of the Debtors; iv) the Unsecured Creditors’ Committee and its counsel; and, v) all parties requesting notices in these matters.

**WHEREFORE**, the Debtors respectfully request that this Honorable Court enter an order setting the Application for hearing on an expedited basis on July 19, 2016 at 10:00 a.m., and for any and all other relief this Court deems necessary and proper.

Respectfully submitted by:

/s/ Barbara B. Parsons

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