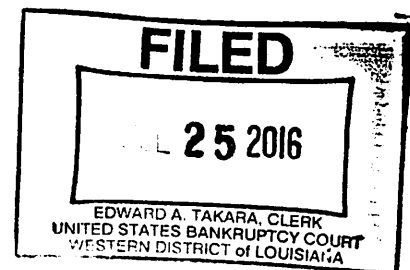


UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF LOUISIANA  
Lafayette Division



IN RE:

CASE NO. 16-50740

PROGRESSIVE ACUTE CARE, LLC, et al.

CHAPTER 11

DEBTORS

JOINTLY ADMINISTERED

**MOTION IN OBJECTION TO DEBTOR DOCKET NO. 183 MOTIONS UNDER 11 U.S.C. SECTION 363(b) AND (f) AND 365 FOR: (I) PRELIMINARY ORDER (i) APPROVING BIDDING PROCEDURES AND STALKING HORSE BID AND FEE, (ii) PRESCRIBING NOTICE REQUIREMENTS, AND (iii) SETTING HEARING DATE, TIME AND PLACE FOR AUCTION SALE OF DEBTOR'S PROPERTY; AND, FOR (II) ORDER APPROVING SALE OF ASSETS AND ASSUMPTION AND ASSIGNMENT OF CERTAIN CONTRACTS AND LEASES AND AMOUNTS OF CURE, IF ANY, RELATING THERETO**

**NOW INTO COURT**, comes Richard Hylland, who has filed Proof of Claim No. 18 in this Case No. 16-50740 evidencing his position as a creditor of Progressive Acute Care, LLC ("PAC") (Richard Hylland referred to as "Claimant" herein). Claimant respectfully herby moves the Court to (i) disallow PAC's proposed and submitted request for a preliminary order approving certain bidding and notice procedures and a Stalking Horse Bid and fee, setting certain times to govern competitive bidding at an auction sale (the "Auction") of certain assets (being the real estate, equipment, inventory, accounts receivable, tangible personal property and intangible personal property (collectively "the Purchased Assets"), and specifically excluding cash and certain other assets of the Debtors' estates (collectively "the Excluded Assets"), and establishing the notice requirements; and, (ii) a final order approving the sale pursuant to Section 363 (b) and 363 (f) of the Bankruptcy Code, free and clear of all liens, claims, and encumbrances, and approving the assumption and assignment of certain executory contracts and leases as well as setting cure amounts, if any, related thereto pursuant to Section 365 of the Bankruptcy Code (the "Motion"), all as described in Debtor's Motion in Case No. 16-50740 Docket No. 183.