

**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 ON FIRST DAY MOTIONS**

**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 specific first day motions identified below (“First Day Motions”) be heard on an expedited basis, 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”). The Debtors also filed the following First Day Motions:

1. Application for Entry of an Order Authorizing the Employment and Retention of SOLIC Capital Advisors, LLC as Financial Advisors (“SOLIC Application”) [P-18];
2. Application for Entry of an Order Authorizing the Employment and Retention of Garden City Group, LLC as Noticing Agent (“Garden City Application”) [P-21];
3. Emergency Motion for an Interim Order (A) Determining Adequate Assurance of Payment for Debtor’s Utility Services, (B) Restraining Utilities from Altering, Disconnecting or Refusing the Debtor Service, And (C) Scheduling a Final Hearing on the Interim Relief

- Sought Herein (“Utility Motion”) [P-10];
4. Motion for Authority to Pay Employees’ Pre-Petition Wages and Benefits (“Motion to Pay”) [P-11];
  5. Motion for Order Authorizing Maintenance of Existing Bank Accounts (“Motion to Maintain Bank Accounts”) [P-12,13];
  6. Emergency Motion for Order Authorizing the Debtor to Use Cash Collateral and Scheduling a Final Hearing (“Cash Collateral Motion”) [P-16];
  7. Motion to Limit Notice [P-19];
  8. Motion for an Order Authorizing the Debtor to Pay Prepetition Claims of Certain Critical Vendors in the Ordinary Course of Business (“Critical Vendor Motion”) [P-15];
  9. Application for Entry of an Order Authorizing the Employment and Retention of Steffes, Vingiello & McKenzie, LLC as Bankruptcy Counsel (“SVM Application”) [P-6]; and,
  10. Motion to Pay Insiders [P-20].

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 First Day Motions are being filed contemporaneously herewith designed to minimize disruption of or irreparable harm to the Debtors' Hospital operations. Without expedited

consideration of this relief, the Debtors' operations are subject to significant disruption and/or harm.

4.

In order for the Debtors to continue to operate the Hospitals, the First Day Motions must be heard on an expedited basis. The Debtors are unable to operate their Hospitals without the approval of the First Day Motions to prevent potential irreparable harm to Hospital operations.

5.

Counsel for the Debtors has communicated with counsel for the Office of the United States Trustee who has no objection to the relief requested herein.

6.

Notice of this motion has been served upon i) the Debtor, ii) The Office of the U.S. Trustee, iii) all parties requesting notice; and, iv) all parties as shown on the Court's Official Mailing List.

**WHEREFORE**, the Debtor respectfully requests that this Honorable Court enter an order setting the First Day Motions for hearing on an expedited basis on a date convenient for the Court; and, for any and all other relief this Court deems necessary and proper.

Respectfully submitted by:

/s/ Barbara B. Parsons  
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