

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

IN RE: CASE NO. 16-50740
PROGRESSIVE ACUTE CARE, LLC, CHAPTER 11
et al. JOINTLY ADMINISTERED

**SUPPLEMENTAL DISCLOSURE FOR *EX PARTE* APPLICATION TO
EMPLOY KEAN MILLER LLP AS CO-COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR PROGRESSIVE
ACUTE CARE, LLC, ET AL. *NUNC PRO TUNC* TO JUNE 21, 2016**

Kean Miller LLP, in its capacity as Interim Co-Counsel for the Official Committee of Unsecured Creditors of Progressive Acute Care, LLC, *et al.* (the “Committee”) submits this Supplemental Disclosure in connection with the pending *Ex Parte* Application to Employ Kean Miller LLP as Co-Counsel for the Official Committee of Unsecured Creditors for Progressive Acute Care, LLC, *et al.*, *nunc pro tunc* to June 21, 2016 [ECF #182] (the “Application”), and respectfully states as follows:

BACKGROUND

1. The Application and the incorporated Affidavit of J. Eric Lockridge discloses connections between Kean Miller and the “Conflicts Check Parties,” as identified in the Application.

2. On July 14, 2016, the Debtors filed their *Motion Under 11 U.S.C. §§ 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 of Debtors’ Property; and, for (II) Order Approving Sale of Assets and Assumption*

and Assignment of Certain Contracts and Leases and Amounts of Cure, if any, Related Thereto [ECF #183] (the “Bidding Procedures Motion”).

3. Paragraph 6 of the Bidding Procedures Motion identifies Central Louisiana Hospital Group, L.L.C. as the proposed “Stalking Horse Bidder” for the Debtors’ principal assets.

4. Paragraph 11 of the Bidding Procedures Motion states that the Stalking Horse Bidder is a Louisiana limited liability company organized by Allegiance Health Management, Inc. (“Allegiance”).

5. Allegiance is a current client of Kean Miller. Kean Miller provides employee-benefit-related legal services to Allegiance. Kean Miller was not involved in or consulted about the formation of the Stalking Horse Bidder or its bid for the Debtors’ principal assets. Kean Miller has not, and will not, provide legal services to Allegiance or any affiliates of Allegiance in connection with this case. *See* 11 U.S.C. § 1103(b).

6. Allegiance has agreed to waive any conflict of interest with regard to Kean Miller’s representation of the Committee.

Respectfully submitted,

Date: August 2, 2016

/s/ J. Eric Lockridge
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*Interim Co-Counsel for the Official Committee of
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Certificate of Service

I hereby certify that a copy of the foregoing *Supplemental Disclosure for Ex Parte Application to Employ Kean Miller LLP as Co-Counsel for the Official Committee of Unsecured Creditors of Progressive Acute Care, L.L.C., et al., Nunc Pro Tunc to June 21, 2016* was served on the Office of the U.S. Trustee, the Debtor through its counsel, and all parties requesting notice through the Court's CM/ECF System on August 2, 2016.

/s/ J. Eric Lockridge