

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

In re:)	Chapter 11
)	
PROGRESSIVE ACUTE CARE, LLC, <i>et al.</i>)	Case No. 16-50740
)	
Debtors.)	Jointly Administered

**MOTION TO WITHDRAW SYSMEX AMERICA, INC.'S OBJECTION TO DEBTOR'S
JOINT CHAPTER 11 PLAN OF ORDERLY LIQUIDATION FOR PROGRESSIVE
ACUTE CARE, LLC, ET AL.**

NOW INTO COURT, through undersigned counsel, comes Sysmex America, Inc. (“**Sysmex**”), which respectfully moves to withdraw its objection to Debtors’ Joint Chapter 11 Plan of Orderly Liquidation for Progressive Acute Care, LLC, et al, (the “**Plan**”) upon the Court’s approval of the Stipulation (as defined herein) and, in support thereof, represents as follows:

1. On June 20, 2017, Sysmex filed an Objection to Debtors’ Joint Chapter 11 Plan of Orderly Liquidation for Progressive Acute Care, LLC, et al. (the “**Objection**”). [Doc. No. 533].
2. Since the filing of the Objection, Sysmex and the Debtor have resolved the issues set forth in the Objection as discussed in the Stipulation Regarding Withdrawal of Objection filed by Debtor (the “**Stipulation**”). [Doc. 538].
3. Upon approval of the Stipulation by the Court, Sysmex agrees to withdraw its Objection.

WHEREFORE, Sysmex prays that the Court approve the Stipulation and, upon approval of the Stipulation, that Sysmex’s Objection [Doc. No. 533] be withdrawn for the reasons set forth

herein and as set forth in the Stipulation.

Respectfully submitted, this 23rd day of June, 2017.

SYSMEX AMERICA, INC.

By: /s/ Mark J. Chaney, III
RICHARD A. AGUILAR (#17439)
MARK J. CHANEY, III (#35704)
McGlinchey Stafford, PLLC
601 Poydras Street, 12th Floor
New Orleans, LA 70130-3477
Email: raguilar@mcglinchey.com
Email: mchaney@mcglinchey.com
Telephone: (504) 586-1200
Facsimile: (504) 596-2800

and

Reinhold F. Krammer
Masuda, Funai, Eifert & Mitchell, Ltd.
203 N. LaSalle Street, Suite 2500
Chicago, Illinois 60601
Telephone: (312) 245-7500
Facsimile: (312) 245-7467
Email: rkrammer@masudafunai.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Withdraw Objection was served on the 23rd of June, 2017, by the electronic case filing system for the United States Bankruptcy Court for the Western District of Louisiana to all parties required to be served, and by United States Mail to the following:

William E. Steffes, Esq.
Barbara B. Parsons, Esq.
Steffes, Vingiello & McKenzie, LLC
13702 Coursey Blvd., Bldg 3
Baton Rouge, LA 70817

Counsel for the Official Committee of
Unsecured Creditors for
Progressive Acute Care, LLC
c/o J. Eric Lockridge, Esq.
Kean Miller, LLP
P.O. Box 3513
Baton Rouge, LA 70821-3513

Office of U.S. Trustee
300 Fannin Street, Suite 3196
Shreveport, LA 71101

Counsel for the Official Committee of
Unsecured Creditors for
Progressive Acute Care, LLC
c/o Boris I. Mankovestskiy, Esq.
Andrew H. Sherman, Esq.
Sillis Cummins & Gross, PC
One Riverfront Plaza
Newark, NJ 07102

/s/ Mark J. Chaney, III