

**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
MOTION TO ASSUME EXECUTORY CONTRACT**

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 *Motion to Assume Executory Contract* [P-56] (“Motion to Assume”) be heard on an expedited basis on June 14, 2016 at a time convenient for the Court, 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 assume their audit services contract with Crowe Horwath, LLP (“Crowe”) pursuant to the provisions of 11 U.S.C. §365(a) and (b)(1)(A), and request the Motion to Assume be heard on an expedited basis as the audit services are required as part of the due diligence requirement by a proposed purchaser of the Hospitals.

4.

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. Counsel also contacted Sharon Whitlow, counsel for Business First Bank, but has not heard back from her as of the filing of this Motion.

5.

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 in each case.

WHEREFORE, the Debtors respectfully request that this Honorable Court enter an order setting the Motion to Assume for hearing on an expedited basis on June 14, 2016 at 10:00 a.m., and for any and all other relief this Court deems necessary and proper.

Respectfully submitted by:

/s/ Noel Steffes Melancon

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