

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

IN RE: PROGRESSIVE ACUTE CARE, LLC,

CASE NO. 16-50740

Debtor

CHAPTER 11

Substantively Consolidated

EX PARTE MOTION TO WITHDRAW AS COUNSEL OF RECORD

Now comes undersigned counsel for creditor NES Louisiana, Inc., and respectfully moves this Court to permit him to withdraw as counsel of record for NES Louisiana, Inc. in the above-captioned matter, on the following grounds:

1. NES Louisiana, Inc., has made an agreement with the Liquidation Trustee for debtor to resolve its claims against debtors herein and in the consolidated cases in this Court, namely: In Re: Progressive Acute Care Avoyelles, LLC, Case No. 16-80584; In Re: Progressive Acute Care Oakdale, LLC, Case No. 16-50742; and In Re: Progressive Acute Care Winn, LLC, Case No. 16-50743, and no longer requires representation of counsel in this matter.
2. NES Louisiana respectfully requests that all further notices or other communications concerning this matter be sent directly to NES Louisiana, Inc., as follows:

NES Louisiana, Inc.,
c/o Jennifer Moore,
Chief Executive Officer
39 Main Street
Tiburon, CA 94920
Phone: (800) 242-6711, Ext. 215
jennifer.moore@neshealth-care.com

3. Undersigned counsel therefore respectfully requests that Mark P. Seyler, and the law firm of Barkley & Thompson, L.C., be permitted to withdraw as counsel of record for NES Louisiana, Inc., in this and the consolidated cases.

Respectfully submitted,

Barkley & Thompson, L.C.
MARK P. SEYLER (Bar No. 17422)
1515 Poydras Street, Suite 2350
New Orleans, Louisiana 70112
Telephone: (504) 595-3350

By: /s/ Mark P. Seyler
Mark P. Seyler (Bar No. 17422)
WITHDRAWING COUNSEL
FOR NES LOUISIANA, INC.

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2017, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel registered for electronic service.

/s/ Mark P. Seyler