UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF LOUISIANA LAFAYETTE DIVISION

In re:

No. 16-50740

Progressive Acute Care, LLC, et al.

Chapter 11

Substantively Consolidated

NOTICE OF HEARING ON THE PAC LIQUIDATION TRUST'S SECOND OMNIBUS OBJECTION TO CLAIMS

To all parties receiving this Objection:

You should review <u>Exhibits 1</u>, <u>2</u>, <u>3</u>, <u>4</u>, and <u>5</u> to the Proposed Order to determine if your claim(s) are subject to this Objection. If your claim(s) are listed on the Exhibits attached to the Proposed Order, you may have substantive rights affected by this Objection.

Your substantive rights also may be affected by further objections that may be filed in this Chapter 11 case.

The relief sought in the Objection is without prejudice to the rights of the Liquidation Trust and any other party in interest to pursue further objections against these claims, and nothing in the Objection or the Proposed Order is intended or shall be deemed to be an allowance of any such claims.

PLEASE TAKE NOTICE that the Matthew E. Rubin, the Liquidation Trustee for the PAC Liquidation Trust (the "Liquidation Trust") appointed in the proceedings of the above-captioned debtors (collectively the "Debtors") filed the attached *PAC Liquidation Trust's Second Omnibus Objection to Claims* (the "Objection").

PLEASE TAKE FURTHER NOTICE that a hearing on the Objection is scheduled before the Honorable Robert R. Summerhays, United State Bankruptcy Judge of the United State Bankruptcy court, Western District of Louisiana, U. S. Courthouse Courtroom, 214 Jefferson Street, Lafayette, Louisiana on <u>December 19, 2017, at 10:00</u> <u>a.m.</u> Any responses to the Objection must be filed with the Clerk of this court and served upon counsel for the PAC Liquidation Trustee and in accordance with the Local Rules of this Court on or before <u>December 12, 2017, at 5:00 p.m.</u>

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PLEASE TAKE FURTHER NOTICE that if you are a claimant and fail to timely file and serve a response to the Objection you will be deemed to have concurred with and consented to the Objection and the relief requested therein, and the Liquidation Trust will present to the Court, without further notice to you, the Proposed Order sustaining the Objection.

Dated: November 17, 2017

Respectfully submitted: /s/ Wade R. Iverstine Wade R. Iverstine, (#31793) **Kean Miller LLP** 400 Convention Street, Suite 700 P. O. Box 3513 (70821-3513) Baton Rouge, LA 70802 Telephone: (225) 382-3448 wade.iverstine@keanmiller.com **Attorneys for the PAC Liquidation Trust**